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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

MARTIN CHAPARRO, and)	
JAMES GOULD and ERIN GOULD,)	
and ERIN GOULD as natural guardian)	Civil Action No. 08 CV - 049B
for FRANK GOULD and)	
JASMINE GOULD,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
COLORADO CASUALTY INSURANCE)	
COMPANY,)	
)	
Defendant.)	

***PLAINTIFFS' DESIGNATION OF ROBIN R. OCKEY, M.D.
AS AN EXPERT WITNESS***

The Plaintiffs herewith designate Robin R. Ockey, M.D. as an expert witness.

Dr. Ockey will testify as to his knowledge, background and experience as a physiatrist. Plaintiffs' Exhibit 169 hereto is his curriculum vitae which includes the list of publications. Plaintiffs' Exhibit 171 is a list of the recent cases in which Dr. Ockey has

testified as an expert witness. Plaintiffs' Exhibit 170 is Dr. Ockey's list of charges and fees for deposition and record review. Copies of Dr. Ockey's reports from the IMEs are attached here as, respectively, Plaintiff's Exhibit 33 (report for examination on September 11, 2006) and Exhibit 34 (report for examination on October 24, 2007). In addition to describing his findings and conclusions from Independent Medical Examinations (IMEs) for the Wyoming Workers' Safety and Compensation Division (which included review of past medical records), Dr. Ockey will be asked to illustrate and explain his findings and opinions with the use of visual aids which may include standard anatomical illustrations and models. He also may be asked to refer to some of the imaging in the medical records to illustrate his testimony. Plaintiffs may employ a timeline exhibit for use by Dr. Ockey in reviewing the progress of Mr. Gould's treatments. In the course of testimony at trial, Dr. Ockey will be asked to prepare an exhibit to summarize his testimony. This will be on either a flip chart, projection, or combination of them. Since Plaintiff Jim Gould's care and treatment are ongoing, Dr. Ockey also may be asked to review any additional findings or results from examinations between now and then. Defendant has requested two additional IMEs of Mr. Gould. Dr. Ockey may be asked to review and comment on, respond to or rebut the resulting reports if and when provided by Defendant, and may be called for rebuttal testimony at trial.

Dated: this 16th day of July, 2008.

/s/Stephen L. Simonton

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CERTIFICATE OF SERVICE

I, Stephen L. Simonton, hereby certify that on this 16th day of July, 2008, I served a true and correct copy of the foregoing *Plaintiffs' Designation of Robin R. Ockey, M.d. as an Expert Witness* by filing it with the Clerk of Court using the CM/ECF system which will send notification to counsel for the Defendant at the following e-mail address and also mailed by U.S. Mail:

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